

PART 6 – CLOSURE REQUIREMENTS

6.1. OVERVIEW

This Part specifies the closure requirements for the WIPP facility. The Permittees shall close the permitted Container Storage Units and Underground Hazardous Waste Disposal Units (**Underground HWDUs**) in accordance with the requirements in 20.4.1.500 NMAC (incorporating 40 CFR §§264.110 through 264.116 and §264.178), this Permit Part, and the procedures described in Permit Attachment G (Closure Plan).

6.2. PERFORMANCE STANDARD

The Permittees shall close the facility as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.111).

6.3. AMENDMENT TO CLOSURE PLAN

The Permittees shall amend Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.112(c)), whenever necessary.

6.4. NOTIFICATION OF CLOSURE

The Permittees shall notify the Secretary in writing at least 60 calendar days prior to the date on which they expect to begin partial closure, e.g., closure of an Underground Hazardous Waste Disposal Unit (**Underground HWDU**), or final closure of the facility as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.112(d) and 264.601). The Permittees shall post a link to the closure notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

6.5. TIME ALLOWED FOR CLOSURE

6.5.1. Partial Closure

Upon completion of disposal operations in an Underground HWDU or upon completion of decontamination and decommission of surface equipment, structures, and soils, the Permittees shall complete partial closure activities as specified in Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.113).

6.5.2. Final Facility Closure

After receiving the final volume of TRU mixed waste, the Permittees shall remove from the facility all non-mixed hazardous waste, dispose in the Underground HWDUs all TRU-mixed hazardous waste and derived waste, and complete closure activities as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.113).

6.6. DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS

As part of either partial closure or final facility closure, the Permittees shall decontaminate or dispose of contaminated equipment, structures, and soils, as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.114).

6.7. CERTIFICATION OF CLOSURE

Within 60 calendar days of completion of closure of each Underground HWDU, and within 60 calendar days of completion of final closure, the Permittees shall certify in writing to the Secretary that the Underground HWDUs and/or facility have been closed as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.115 and 264.601).

6.8. SURVEY PLAT

No later than the submission of the certification of closure of each Underground HWDU, the Permittees shall submit a survey plat detailing the location and dimensions of each Underground HWDU with respect to permanently surveyed benchmarks, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.116).

6.9. CLOSURE OF PERMITTED CONTAINER STORAGE UNITS

At closure of the WHB Unit and Parking Area Unit, the Permittees shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.178).

6.10. CLOSURE OF PERMITTED DISPOSAL UNITS

6.10.1. Panel Closure

The Permittees shall close each Underground HWDU in a manner that meets the closure standard for volatile organic compounds in Table 6.10.1, which represent health based levels (HBLs) at the location of the nearest permanent downwind resident nearest resident beyond the WIPP site boundary. Upon completion of disposal in an Underground HWDU, the Permittees shall provide written notification to the Secretary stating the final volume of TRU mixed waste emplaced in the Underground HWDU. The Permittees shall also close the Underground HWDU as specified in Permit Attachment G and Permit Attachment G1 (~~WIPP Panel Closure Design Description and Specifications Detailed Design Report for an Operation Phase Panel Closure System~~). The Permittees shall post a link to the final panel volume notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

Table 6.10.1. WIPP Panel Closure Volatile Organic Compound Closure Standard for Public Exposures	
Volatile Organic Compound	WIPP HBL $\mu\text{g}/\text{m}^3$
Carbon Tetrachloride	0.33
Toluene	5,000
Trichloroethylene	0.39
Chloroform	0.087
Methylene Chloride	101
1,1,1-Trichloroethane	5,000
1,1,2,2-Tetrachloroethane	0.035
1,2-Dichloroethane	0.077
1,1-Dichloroethylene	200
Chlorobenzene	50.0

6.10.2. Repository Closure

Upon completion of disposal in the repository and closure of all Underground HWDUs, the Permittees shall close the repository as specified in Permit Attachment G and Permit Attachment G2 (Shaft Sealing System Compliance Submittal Design Report).

6.10.3. Repository Post-Closure

Upon completion of repository closure as specified in Permit Section 6.10.2, the Permittees shall comply with all post-closure requirements as specified in Permit Part 7, Post-Closure Care.

PERMIT ATTACHMENTS

Permit Attachment G, “Closure Plan.” ~~—(as modified from WIPP RCRA Part B Permit Application, “Closure Plans, Post-Closure Plans, and Financial Requirements”—Chapter I).~~

Permit Attachment G1, “WIPP Panel Closure Design Description and Specifications.” ~~—(as modified from WIPP RCRA Part B Permit Application, “Detailed Design Report for an Operation Phase Panel Closure System”—Appendix II).~~

Permit Attachment G2 (as modified from WIPP RCRA Part B Permit Application, “Shaft Sealing System Compliance Submittal Design Report” - Appendix I2).

PART 6 – CLOSURE REQUIREMENTS.....	1
6.1. OVERVIEW.....	1
6.2. PERFORMANCE STANDARD.....	1
6.3. AMENDMENT TO CLOSURE PLAN.....	1
6.4. NOTIFICATION OF CLOSURE.....	1
6.5. TIME ALLOWED FOR CLOSURE.....	1
6.5.1. Partial Closure.....	1
6.5.2. Final Facility Closure.....	1
6.6. DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS.....	2
6.7. CERTIFICATION OF CLOSURE.....	2
6.8. SURVEY PLAT.....	2
6.9. CLOSURE OF PERMITTED CONTAINER STORAGE UNITS.....	2
6.10. CLOSURE OF PERMITTED DISPOSAL UNITS.....	2
6.10.1. Panel Closure.....	2
6.10.2. Repository Closure.....	3
6.10.3. Repository Post-Closure.....	3